

M87 Written Statement from Just Space 2718

Aviation

The Mayor's response to Preliminary Question 13 is relevant to this matter.

M87. (a) Are the requirements of Policy T8 necessary to address the strategic priorities of London and, if so, would they be effective in that regard?

Policy T8 clause B assumes that airports enhance London's spatial growth, although this is counterbalanced to a certain extent by clause C; but even this omits the social and economic adverse impacts together with opportunity costs. Accordingly, the present wording of Policy T8 would not strike an appropriate balance between aviation and the strategic priorities of London.

Airports and aviation comes with a multitude of development pressures, issues and opportunities that lead to severe tensions between growth and environmental degradation and harm. These tensions and adverse impacts are currently unacceptable, unsustainable and will be compounded and multiplied by the growth envisaged for airports and environs.

For example, LB of Hillingdon's part of the Heathrow Opportunity Area is characterised by large areas of Green Belt which will mean that the burden of accommodating airport related development will be passed to the Southall – West Drayton corridor. And this corridor is experiencing the anticipation of the arrival of Crossrail with models of housing development that extinguish local workplaces, do not provide accommodation that meets needs and impose further demands on already stressed local infrastructure and services, particularly education and health. Expansion or intensification of Heathrow Airport would exacerbate these issues by creating additional demands and displacing existing uses which Policy T8 does not directly address, and is, therefore, ineffective in this respect.

(b) Or does policy T8 cover matters that are dealt with by national policy and/or would be more appropriately dealt with through local plans or neighbourhood plans?

It can be argued that the Airports National Policy Statement (ANPS) 26 June 2018 sets out the policy framework, including expansion at Heathrow airport, and is the primary basis for decision-making on any development application for a new north-west runway beside Heathrow Airport. Therefore, clause A is rendered superfluous. However, the ANPS has had consequences for the preparation of Part 2 of the LB of Hillingdon Local Plan which the Planning Inspector for the current Examination has set out in his advice note ¹: that development management policies that refer to airport related uses or development outside the Heathrow Airport boundary should be deleted, effectively leaving voids in up to date plan coverage.

As a result, at the local level, planning control over development is stunted. Into this local plan policy vacuum and an absence of specificity in the ANPS on, among other things, mitigation, the Mayor's proposal for a planning framework is welcomed in general terms, if not in detailed ones. And he has explained his advancement of London Plan policy in his answer PQ13.

With the pressure on local Environmental Health and Planning Departments due to reduced resourcing, it is welcomed that the Mayor through T8 clause C sets out expectations that the

aviation industry should fully meet its external and environmental costs, particularly in respect of noise nuisance, air quality infringements and climate change. The Mayor is availing of the power and opportunities of the planning system to identify some of the basis on which sustainable development is to be achieved.

(c) Are changes to Policy T8 and/or other parts of the Plan necessary to ensure consistency with national policy relating to Heathrow Airport including the *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (June 2018)*?²¹

²¹ The Mayor responded to the Panel's Preliminary Question PQ13 relating to this matter on Friday 7 September 2018.

Some aspects of the answer to this question can be found in the preceding answers. As been noted above there is an absence of specificity in the ANPS and, therefore, the Mayor's policy in general terms is a useful enhancement of national policy providing greater clarity and certainty as to planning requirements.

Nevertheless, he or she could go further by supporting policy with clarity on the standards to be met and remove the ambiguity and uncertainty arising from clause G, in particular the phrase 'better use'.

Regarding clauses C and D, as with many other forms of development, any expansion or intensification must have their environmental and health adverse impacts fully addressed, not worsen existing air pollution and provide transport networks that are able to accommodate any additional (surface) trips. However, clause C does not go far enough and fails to reference the social and economic adverse impacts together with the opportunity costs.

As for clause E, it is necessary that the funding of extensive transport measures to support any intensification of activities at Heathrow Airport and its expansion should be by the airport owner or developer and not at the expense of the public purse. Any public monies should be used to support appropriate capital investment elsewhere in London.